

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF Columbia

Lucas Ward
[Enter the full name of the plaintiff in this action]
3841 Leeds Ave
Charleston, S.C. 29405
v.
Sheriff Al Cannon;
Officer J. Phillips; and
Officer D. Horner;

[Enter above the full name of defendant(s) in this action]

Civil Action No. _____
(to be assigned by Clerk)

COMPLAINT
State Prisoner

Case: 1:16-cv-02122
Assigned To : Unassigned
Assign. Date : 10/25/2016
Description: Pro Se Gen. Civil (F Deck)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise related to your imprisonment? Yes _____ No ☒
- B. If your answer to A is Yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

1. Parties to this previous lawsuit:

Plaintiff: N/A

Defendant(s): N/A

2. Court: N/A
(If federal court, name the district; if state court, name the county)

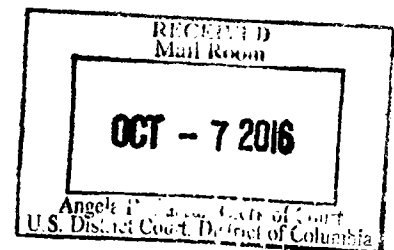
3. Docket Number: N/A

4. Name(s) of Judge(s) to whom case was assigned: N/A

5. Disposition: N/A
(For example, was the case dismissed? Appealed? Pending?)

6. Approximate date of filing lawsuit: N/A

7. Approximate date of disposition: N/A



II. PLACE OF PRESENT CONFINEMENT

- A. Name of Prison/Jail/Institution: Charleston County Detention Center
- B. What are the issues that you are attempting to litigate in the above-captioned case? Infringement
of U.S.C Amend. VIII Cruel and unusual Punishment, Failure to Protect
- C. (1) Is there a prisoner grievance procedure in this institution? Yes ☒ No ☐
- (2) Did you file a grievance concerning the claims you are raising in this matter? Yes ☒ No ☐
- When 8-4-16 Grievance Number (if available) N/A
- D. Have you received a final agency/departmental/institutional answer or determination concerning this matter (i.e., your grievance)? Yes ☐ No ☒
- E. When was the final agency/departmental/institutional answer or determination received by you? Never
- If possible, please attach a copy of your grievance and a copy of the highest level decision concerning your grievance that you have received.*
- F. If there is no prison grievance procedures in this institution, did you complain to prison, jail, or institutional authorities? Yes ☒ No ☐
- G. If your answer is YES:
1. What steps did you take? I allowed Superior Officers to know of incidence
 2. What was the result? The officer responsible was reprimanded & eradicated

III. PARTIES

In Item A below, place your name, inmate number, and address in the space provided. Do the same for additional plaintiffs, if any.

- A. Name of Plaintiff: Lucas Ward Inmate No.: 1245061
- Address: 3841 Ired's Ave N. Charleston, SC 29405

In Item B below, place the full name of the defendant, his official position, and place of employment in the space provided. Use Item C for additional defendants, if any.

- B. Name of Defendant: Al Cannon Position: Sheriff
- Place of Employment: The Charleston County Detention Center
- C. Additional Defendants (provide the same information for each defendant as listed in Item B above):
- J. Phillips, Subordinate Officer at the Charleston County
Detention Center; D. Homer, Subordinate Officer at
the Charleston County Detention Center.

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach an extra sheet if necessary.

Sunday 9/4/16 While being housed in unit (S.M.U.) at the Charleston County detention center. At time in the S.A.C. D.C system I was on protective custody due to my custody level. Minutes before my recreation time officer D. Homer and J. Phillips I reminded to secure all doors because I have many enemies in this unit and they refused. I told those two officers of prior incidents with other inmates and they laugh and D. Homer ask me "ward can I bring you out with a group can I" knowing I'm housed around enemies and knowing I have recreation time alone. they ignored the rules in the system and still gave me recreation time with other inmates. I told officer "D. Homer" "I have rec alone" officer Phillips and officer Homer approached my cell twice before "rec" I told them I fear for my safety. While at "rec" officer J. Phillips deliberately opened the door, for my enemy in the system of 3 years, "Marvin Clifford" to attack me while officer D. Homer stood looking around as if he was unaware. While I was being attacked officer J. Phillips did absolutely nothing to protect me he just stood over us watching and told me to let "Marvin Clifford" arm go so he could hit me. Due to this cruel and unusual punishment and failure to protect I suffer from back pain up to my neck and an impaired vision.

IV. STATEMENT OF CLAIM - continued.

Civil liability for deliberate indifference to serious medical needs. *Estelle v. Gamble*, 429 U.S. 97 (1976), 50 L.Ed. 2d 251, 97s.Ct. 285 (1976)

The medical staff at the Charleston County Detention Center denied me the medical assistance I needed. Officer Whyllie has me on video in housing unit (Bmw) vomiting blood. I grieved an complain to the medical staff and I was prescribe medication for acid reflux such as famprazole, Zantac, prilosec, none of which helped whatsoever. I continued vomiting blood with no further medical evaluation. The nurse only said "maybe it was something you ate" "maybe its stomach acids" but did nothing to find out why I'm vomiting blood.

As far as poor living conditions go there's mold in cells and the showers. I was denied my commissary for 2 weeks and this facility denied me a shower for 7 days. I was denied phone calls and visits, the proper nutrition as so just a sandwich ever meal for 9 days. I was denied clean water to drink. I was left in a cell with no way to see out or call for help when I faint and vomit. Officer W.R. HEPP is the acting officer who denied me a shower for 7 days. Officer SCRUGGS A. was the acting officer on shift and Sgt. Rayan that signed off on the slip to denied me everything inbetween as far as phone calls, visits and commissary, showers, recreation time for 7 days.

V. RELIEF

State briefly and exactly what you want the court to do for you.

I would like the court to please file my lawsuit so I
can take further steps about my safety and Health and living
conditions.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this Lucas Ward day of Sept. 25, 16 Sunday, 20 16.

Lucas Ward

Signature of Plaintiff